

was operating in and around an apartment complex known as the "AK Houses" located at East 128th Street in the Harlem neighborhood of Manhattan, New York. From at least in or about May 2017, up to and including in or about November 2019, VAN WHITMORE, a/k/a "V-High," RONALD NIXON, a/k/a "Jeter," BARRY WILLIAMS, a/k/a "Bistro," RODNEY ROBINSON, a/k/a "Stretch," KAPRIE LAMBERT, a/k/a "Pri," IAN HAYLOCK, a/k/a "E," SHAROD BELL, a/k/a "Rodo," MALIK HAWKINS, a/k/a "Leeky," ABDOUL HANNE, a/k/a "Buylot," MALIK BREEDLOVE, a/k/a "LB," TYRELL MURPHY, a/k/a "Fat Cat," and ANTHONY MCDADE, a/k/a "Pap," the defendants, all of whom were members of the AK Houses Crew, and others known and unknown, conspired to distribute cocaine base, or "crack," in the vicinity of the AK Houses. During that period, the AK Houses Crew sold at least hundreds of grams of crack to its customers on the streets of Harlem.

2. Members of the AK Houses Crew fulfilled different roles within the Crew. VAN WHITMORE, a/k/a "V-High," RONALD NIXON, a/k/a "Jeter," and BARRY WILLIAMS, a/k/a "Bistro," the defendants, among others, were leaders of the AK Houses Crew. WHITMORE, NIXON, and WILLIAMS were responsible for, among other things, obtaining supplies of powder cocaine, converting the cocaine into crack, pushing that crack to customers on the street through the Crew's network of street-level dealers, and maintaining order and discipline within the Crew, including with

threats of violence.

3. Other members of the AK Houses Crew, including RODNEY ROBINSON, a/k/a "Stretch," KAPRIE LAMBERT, a/k/a "Pri," SHAROD BELL, a/k/a "Rodo," and IAN HAYLOCK, a/k/a "E," the defendants, served the Crew by, among other things, managing and enforcing order within the Crew's network of street-level crack dealers, and collecting proceeds from their crack sales to finance the Crew's operations.

4. The Crew's street-level crack dealers included MALIK HAWKINS, a/k/a "Leeky," ABDOUL HANNE, a/k/a "Buylot," MALIK BREEDLOVE, a/k/a "LB," TYRELL MURPHY, a/k/a "Fat Cat," and ANTHONY MCDADE, a/k/a "Pap," the defendants, each of whom obtained crack from other members of the Crew and sold the crack to the Crew's customers on the street. The Crew sold crack in the vicinity of, among other locations in the area of the AK Houses, the Metro-North commuter rail station at East 125th Street, and Public School 30 at East 128th Street. Between in or about May 2017 and the present, members of the AK Houses Crew sold over 300 grams of crack, in the course of numerous transactions, to undercover law enforcement officers in Harlem.

5. In addition, certain members of the AK Houses Crew, including VAN WHITMORE, a/k/a "V-High," RODNEY ROBINSON, a/k/a "Stretch," IAN HAYLOCK, a/k/a "E," SHAROD BELL, a/k/a "Rodo," and MALIK HAWKINS, a/k/a "Leeky," the defendants, used and

facilitated the use of firearms in furtherance of the Crew's crack dealing, including for the purposes of enforcing the collection of payment for drugs and to protect members of the Crew. In the course of the narcotics conspiracy, HAYLOCK and BELL also sold firearms to undercover law enforcement officers in Harlem.

Statutory Allegations

6. From at least in or about May 2017, up to and including in or about November 2019, in the Southern District of New York and elsewhere, VAN WHITMORE, a/k/a "V-High," RONALD NIXON, a/k/a "Jeter," BARRY WILLIAMS, a/k/a "Bistro," RODNEY ROBINSON, a/k/a "Stretch," KAPRIE LAMBERT, a/k/a "Pri," IAN HAYLOCK, a/k/a "E," SHAROD BELL, a/k/a "Rodo," MALIK HAWKINS, a/k/a "Leeky," ABDOUL HANNE, a/k/a "Buylot," MALIK BREEDLOVE, a/k/a "LB," TYRELL MURPHY, a/k/a "Fat Cat," and ANTHONY MCDADE, a/k/a "Pap," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

7. It was a part and an object of the conspiracy that VAN WHITMORE, a/k/a "V-High," RONALD NIXON, a/k/a "Jeter," BARRY WILLIAMS, a/k/a "Bistro," RODNEY ROBINSON, a/k/a "Stretch," KAPRIE LAMBERT, a/k/a "Pri," IAN HAYLOCK, a/k/a "E," SHAROD BELL, a/k/a "Rodo," MALIK HAWKINS, a/k/a "Leeky," ABDOUL HANNE,

a/k/a "Buylot," MALIK BREEDLOVE, a/k/a "LB," TYRELL MURPHY, a/k/a "Fat Cat," and ANTHONY MCDADE, a/k/a "Pap," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

8. The controlled substance that VAN WHITMORE, a/k/a "V-High," RONALD NIXON, a/k/a "Jeter," BARRY WILLIAMS, a/k/a "Bistro," RODNEY ROBINSON, a/k/a "Stretch," KAPRIE LAMBERT, a/k/a "Pri," IAN HAYLOCK, a/k/a "E," SHAROD BELL, a/k/a "Rodo," MALIK HAWKINS, a/k/a "Leeky," ABDOUL HANNE, a/k/a "Buylot," MALIK BREEDLOVE, a/k/a "LB," TYRELL MURPHY, a/k/a "Fat Cat," and ANTHONY MCDADE, a/k/a "Pap," the defendants, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Firearms Offense)

The Grand Jury further charges:

9. From at least in or about May 2017, up to and including in or about November 2019, in the Southern District of New York and elsewhere, VAN WHITMORE, a/k/a "V-High," RODNEY

ROBINSON, a/k/a "Stretch," IAN HAYLOCK, a/k/a "E," SHAROD BELL, a/k/a "Rodo," and MALIK HAWKINS, a/k/a "Leeky," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the drug trafficking offense charged in Count One of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c) (1) (A) (i) and 2.)

FORFEITURE ALLEGATIONS

10. As a result of committing the offense alleged in Count One of this Indictment, VAN WHITMORE, a/k/a "V-High," RONALD NIXON, a/k/a "Jeter," BARRY WILLIAMS, a/k/a "Bistro," RODNEY ROBINSON, a/k/a "Stretch," KAPRIE LAMBERT, a/k/a "Pri," IAN HAYLOCK, a/k/a "E," SHAROD BELL, a/k/a "Rodo," MALIK HAWKINS, a/k/a "Leeky," ABDOUL HANNE, a/k/a "Buylot," MALIK BREEDLOVE, a/k/a "LB," TYRELL MURPHY, a/k/a "Fat Cat," and ANTHONY MCDADE, a/k/a "Pap," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of,

said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

11. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

Tom M.
FOREPERSON

Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

VAN WHITMORE, a/k/a "V-High," RONALD
NIXON, a/k/a "Jeter," BARRY WILLIAMS,
a/k/a "Bistro," RODNEY ROBINSON, a/k/a
"Stretch," KAPRIE LAMBERT, a/k/a "Pri,"
IAN HAYLOCK, a/k/a "E," SHAROD BELL,
a/k/a "Rodo," MALIK HAWKINS, a/k/a
"Leeky," ABDOUL HANNE, a/k/a "Buylot,"
MALIK BREEDLOVE, a/k/a "LB," TYRELL
MURPHY, a/k/a "Fat Cat," and ANTHONY
MCDADE, a/k/a "Pap,"

Defendants.

SEALED INDICTMENT

19 Cr. __

(21 U.S.C. §§ 841 and 846; 18 U.S.C. §§
924(c) and 2.)

GEOFFREY S. BERMAN
United States Attorney

Yours truly
Foreperson

*Sealed Indictment Filed.
12 arrest warrants.
Hon. Sarah Netburn, USA
11/21/19.*